

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHEILA PORTER,)	
Plaintiff)	
)	
)	
v.)	
)	Civil Action No. 04-11935-DPW
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.)	
Defendants)	
)	

DEFENDANTS' MOTION FOR LEAVE TO FILE MEMORANDUM
IN EXCESS OF TWENTY PAGES

Now come the Defendants, Andrea Cabral, Suffolk County Sheriff's Department, and Suffolk County who move this Honorable Court for leave to file a memorandum of law in excess of the twenty page limit of L.R. 7.1(B)(4). Defendants' Memorandum in Support of their Motion for Summary Judgment is 34 pages in length. As grounds therefore, the Defendants state:

1. The Plaintiff's Amended Complaint contains a total of eleven counts and included 154 numbered paragraphs.
2. The Amended Complaint alleges constitutional violations, violations of Massachusetts' law and common law claims.
3. The number of issues raised by the Amended Complaint against the Defendants cannot adequately be addressed in a memorandum of twenty pages in the circumstances of this case.

Wherefore, Defendants respectfully request that this honorable Court grant their request to exceed the page limitations of Local Rule 7.1(B)(4) and allow them to file a twenty-eight page Memorandum in Support of their Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56.

Respectfully submitted
Andrea Cabral, Suffolk County Sheriff's
Department and Suffolk County
By their attorney

/s/ Ellen M. Caulo
Ellen M. Caulo
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Deputy General Counsel
Suffolk County Sheriff's Department
200 Nashua Street
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Date: October 17, 2005

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

Counsel for the Defendants hereby certifies pursuant to the requirements of Local Rule 7.1(A)(2), she has conferred with counsel for the Plaintiff and that counsel has assented to this motion.

/s/ Ellen M. Caulo
Ellen M. Caulo
Deputy General Counsel